

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA

v.

GREGORY COLBURN, et al.,

Defendants.

Cr. No. 19-10080-NMG

Leave to File Under Seal Granted
October 6, 2021, ECF 2354

**DEFENDANTS' OFFER OF PROOF
FOR EVIDENCE EXCLUDED DURING TRIAL**

Defendants Gamal Abdelaziz and John Wilson submit as an offer of proof the attached exhibits, filed under seal, for the purpose of ensuring that there exists a complete record with respect to the Court's rulings excluding various exhibits offered by Defendants during trial. All of the attached exhibits were offered by Defendants and excluded by the Court. Defendants maintain that each and every attached exhibit should have been admitted into evidence and presented to the jury because such exhibits are all relevant to material issues at trial, are admissible under the Federal Rules of Evidence, and are not prejudicial to the government for the reasons stated on the record at the times such exhibits were offered.

Respectfully submitted:

By their counsel

/s/ Michael Kendall

Michael Kendall (BBO # 544866)
Lauren M. Papenhausen (BBO# 655527)
WHITE & CASE LLP
75 State Street
Boston, MA 02109-1814
Telephone: (617) 979-9310
michael.kendall@whitecase.com
lauren.papenhausen@whitecase.com

Andrew E. Tomback (pro hac vice)
MCLAUGHLIN & STERN, LLP
260 Madison Avenue
New York, NY 10016
Telephone: (212) 448-0066
atomback@mclaughlinstern.com

Counsel for John Wilson

/s/ Brian T. Kelly

Brian T. Kelly (BBO # 549566)
Joshua C. Sharp (BBO # 681439)
Lauren M. Maynard (BBO # 698742)
NIXON PEABODY LLP
53 State Street
Boston, MA 02109
617-345-1000
bkelly@nixonpeabody.com
jsharp@nixonpeabody.com
lmaynard@nixonpeabody.com
Robert Sheketoff (BBO # 457340)
One McKinley Square
Boston, MA 02109
(617) 367-3449

Counsel for Gamal Abdelaziz

Dated: October 6, 2021

CERTIFICATE OF SERVICE

This document is being filed on the date appearing in the header through the ECF system, which will provide electronic copies to counsel of record.

/s/ Lauren Papenhausen

Lauren Papenhausen